

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

In Re Bacone College Debtor)))))) Case Number: 24-80487-PRT) Chapter 7
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**TRUSTEE'S OBJECTION TO RON BROWN'S SECOND APPLICATION FOR
COMPENSATION**

COMES NOW Luke Homen, duly appointed Trustee in the above-referenced case (the "Trustee") by and through his attorney of record Alex Sullivan of Luke Homen Law, PLLC, and responds to Ron Brown, former counsel for the Debtor's ("Counsel") Second Application for Compensation (the "Application") [Docket #177] with the following Objection:

1. This case was converted from Chapter 11 to Chapter 7 on May 13, 2025.
2. Counsel filed his Application on June 16, 2025.
3. Counsel, through his Application, relies on 11 U.S. §330 and seeks to be paid first in priority with funds of the Bankruptcy Estate.
4. Counsel's Application violates the priority of administrative expense claims under §726(b), and thus the Application should be denied.
5. Counsel's Application states that there are currently \$10,000 in a Trust account which constitutes the Debtor's retainer.
6. On information and belief, the Trustee alleges that there is actually \$14,959.00 currently held by Counsel.
7. Counsel should immediately turn the Debtor's on-hand retainer funds of \$14,959.00 over to the Trustee.

The Trustee would hereby request that Ron Brown's Second Application for Compensation (Docket #177) be DENIED.

Respectfully Submitted,

Luke Homen Law, PLLC

By: /s/ Alex Sullivan

Alex Sullivan
OK Bar #33618
Luke Homen Law, PLLC
10313 Greenbriar Parkway
Oklahoma City, Oklahoma 73159
alex@lukehomenlaw.com
phone: (405) 639-2099
fax: (405) 252-1654
Attorneys for Trustee Luke Homen

CERTIFICATE OF SERVICE

I certify that on June 26, 2025, I electronically transmitted this Objection to Second Application for Compensation filed on June 26, 2025, to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit the Response and Notice of Hearing to all ECF registrants, to include the following:

Office of the AUST

Luke A. Homen
Chapter 7 Trustee

Ron Brown
Former Counsel for the
Debtor

/s/Alex Sullivan

Alex Sullivan
Luke Homen Law, PLLC